



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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April 3, 2006

DR. CURTIS SMITH
800 HIGHLAND DRIVE
BELLINGHAM WA 98225

Subject: Complaint filed against Shirley Jacobson / Clean Water Health Advocates –
PDC Case #06-290

Dear Dr. Smith:

The Public Disclosure Commission (PDC) staff has completed its investigation of your complaint received October 12, 2005 alleging that Shirley Jacobson / Clean Water Health Advocates failed to include proper sponsor identification in a newspaper insert political advertisement, an alleged violation of RCW 42.17.510, and failed to register and report with the PDC as a political committee, an alleged violation of RCW 42.17.040, .080, and .090.

PDC staff reviewed the complaint in light of the following statutes:

RCW 42.17.020 defines a political committee as “any person (except a candidate or an individual dealing with his or her own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition.”

RCW 42.17.510 requires all written political advertising, whether relating to candidates or ballot propositions, to include the sponsor's name and address.

You alleged that Shirley Jacobson / Clean Water Health Advocates failed to include proper sponsor identification in a political advertisement included in the October 19, 2005 edition of the *Bellingham Herald*. You further alleged that Clean Water Health Advocates was a political committee with the expectation of raising and spending contributions to oppose a ballot measure, and failed to register and report as such with the PDC.

We found that:

- Clean Water Health Advocates is the name used by Shirley Jacobson as the sponsor of her political advertising. Ms. Jacobson is the only person associated



with Clean Water Health Advocates. Ms. Jacobson sponsored and paid for the insert in the *Bellingham Herald* to oppose City of Bellingham Proposition 1 in the November 8, 2005 general election. For the insert, she made use of a "recycled" graphic design provided by an artist and activist in Olympia. However, the cost of the advertisement was borne by Ms. Jacobson alone. She was an individual dealing with her own funds or property. Thus, she did not form a political committee.

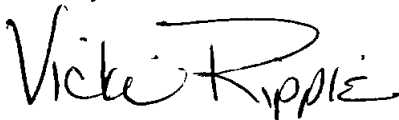
- On October 20, 2005, Ms. Jacobsen filed a C-6 Independent Expenditure report with the PDC, timely disclosing her expenditures for the advertisement inserted in the October 19, 2005 *Herald*. On this report, she identified the insert's sponsor as "Shirley Jacobson (Clean Water Health Advocates)."
- Ms. Jacobson was not aware of the existence of laws and rules concerning political advertising sponsor identification requirements. She believed that because her name was on file at the *Bellingham Herald* as the insert's sponsor, and because she had filed a C-6 form under her own name disclosing her sponsorship of the insert, this information was available to the public. When she received word from the political advertising staff of the *Herald* that her ad had been accepted, she believed that it was in compliance with all applicable requirements.

In accordance with standard PDC practice, Shirley Jacobson was sent a sponsor identification warning letter for failing to include her name and address, along with the name Clean Water Health Advocates, as the sponsor of the political advertising. No additional enforcement action is warranted in this case.

After a careful review of the alleged violations and relevant facts, we have concluded our investigation and, with the concurrence of the Chair of the Public Disclosure Commission, I am dismissing your complaint against Shirley Jacobson / Clean Water Health Advocates. Ms. Jacobson is being notified of this dismissal by separate letter.

If you have questions, please feel free to contact Phil Stutzman, Director of Compliance, at (360) 664-8853 or toll free at 1-877-601-2828.

Sincerely,

A handwritten signature in black ink that reads "Vicki Rippie". The signature is fluid and cursive, with the first name "Vicki" and last name "Rippie" clearly distinguishable.

Vicki Rippie
Executive Director